



POLICY/GUIDELINE TITLE: Corporate Compliance HelpLine	ADMINISTRATIVE POLICY AND PROCEDURE MANUAL
POLICY #: 800.08	CATEGORY: Compliance and Ethics
System Approval Date: 9/14/17	Effective Date: 03/2009
Site Implementation Date: 10/27/17	Last Reviewed/Approved: 09/15/2016
Prepared by: Office of Corporate Compliance	Notations:

GENERAL STATEMENT of PURPOSE

Northwell Health is committed to the timely identification and resolution of all issues that may adversely affect employees, patients, or the organization. Therefore, Northwell Health has established communication channels to report problems and concerns, including a Corporate Compliance HelpLine number (800-894-3226) and website (www.northwell.ethicspoint.com). The HelpLine is available 24 hours, seven days a week. Individuals are encouraged to report any problem or concern either anonymously or in confidence via the HelpLine as they deem appropriate. Individuals also have the option of contacting the Office of Corporate Compliance Office directly via telephone at 516-465-8097 or fax at 516- 465-8996 during regular business hours or in-person at 200 Community Drive, Great Neck, New York.

The Corporate Compliance HelpLine is an avenue by which individuals or interested parties may report any issue or question associated with any of Northwell Health’s policies, conduct, practices or procedures believed by the individual to be a potential violation of criminal, civil or administrative law, or any unethical conduct.

All individuals are protected from intimidation and retaliation for good faith participation in Northwell Health’s Compliance Program. Failure to report a compliance issue may be grounds for disciplinary action.

Examples of potential compliance issues include, but are not limited to:

- Inappropriate coding
- Inappropriate charging/billing
- Inappropriate charge code selection/chargemaster
- Inappropriate claims submission
- Overpayments
- Medical necessity issues

- Cost reporting issues
- False or fraudulent documentation issues
- Requests from Fiscal Intermediary/Carrier
- HIPAA or Patient Privacy issues
- EMTALA issues
- Failure to follow policies and procedures
- Failure to follow Code of Ethical Conduct
- Drug diversion (illegal sale or redistribution of drugs)
- Physician relationship issues such as potential violations of the Stark law or Anti - Kickback statute
- Potential violations of the Anti-Kickback statute related to vendors (e.g., inappropriate gifts)
- Provider or Supplier Excluded from the Federal or State Health Care Programs
- Inappropriate Conflict of Interest
- Retaliation or Intimidation

POLICY

1. Northwell Health will maintain a Corporate Compliance HelpLine that individuals may use to report problems and concerns, which may be done anonymously.
2. Individuals who report problems and concerns via the Corporate Compliance HelpLine or to the Corporate Compliance Office in good faith are protected from any form of retaliation, intimidation and/or retribution. See also Northwell Health Policy #800.09 - Detecting and Preventing Fraud, Waste and Abuse, Northwell Health Policy # 800.01 - Non-Retaliation and Non-Intimidation, and Northwell Health Human Resources Policy Part 5-3 – Conduct in the Workplace/Progressive Discipline.
3. Information concerning the Corporate Compliance HelpLine will be posted in prominent common areas of Northwell Health facilities.
4. All individuals who receive compliance inquiries are expected to act with the utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is assigned responsibilities for assisting with compliance inquiries shall keep the inquiries confidential to the extent possible.

SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Hofstra Northwell School of Medicine conducting research on behalf of the School of Medicine on or at any Northwell Health facility; and the faculty and students of the Hofstra Northwell School of Graduate Nursing and Physician Assistant Studies.

DEFINITIONS

N/A

PROCEDURE/GUIDELINES

Process

1. The Office of Corporate Compliance will ensure that all compliance inquiries are addressed in an appropriate and timely manner, as well as in accordance with this and all related policies and procedures. No attempt will be made to identify a caller to the Corporate Compliance HelpLine who requests anonymity. Whenever callers disclose their identity, it will be held in confidence to the fullest extent practicable.
2. Upon receipt of the disclosure, the Chief Corporate Compliance Officer or his/her designee shall gather all relevant information from the disclosing individual where practicable. The Chief Corporate Compliance Officer/designee shall make a preliminary, good faith inquiry into the allegations to ensure all the necessary information has been obtained to determine whether a further review should be conducted.
3. In accordance with Northwell Health Policy #800.06 - Corporate Compliance Investigative Resolution Process, Northwell Health shall conduct an internal review of the allegations and ensure that proper follow-up is conducted for any disclosure that is sufficiently specific, so that it reasonably permits a determination of the appropriateness of the alleged improper practice and provides an opportunity for taking corrective action.
4. Calls will be logged in a case-tracking database upon receipt and placed in care of the custody of the Office of Corporate Compliance.
5. The investigation and response process may involve other departments, as appropriate, for advice and/or further investigation.
6. The Office of Corporate Compliance will communicate any matter deemed potentially unlawful to the Office of Legal Affairs for determination.
7. The Chief Corporate Compliance Officer will periodically report on Corporate Compliance HelpLine activity to the Executive Audit and Compliance Committee and the Audit and Corporate Compliance Committee of the Northwell Health Board of Trustees and other committees as appropriate.

REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

Northwell Health Policy #800.01 – Non-Intimidation and Non-Retaliation Policy
Northwell Health Policy #800.06 - Corporate Compliance Investigative Resolution Process
Northwell Health Policy #800.09 - Detecting and Preventing Fraud, Waste and Abuse
Northwell Health Human Resources Policy Part 5-3 – Conduct in the Workplace/Progressive Discipline

CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

N/A

ATTACHMENTS

N/A

FORMS

VD001B Hospital Inhouse Directory Form

<u>APPROVAL:</u>	
System Administrative P&P Committee	7/27/17
System PICG/Clinical Operations Committee	9/14/17

Standardized Versioning History:

*=Policy Committee Approval; ** =PICG/Clinical Operations Committee Approval

5/10/11* 5/26/11**

8/25/16* 9/15/16**